

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOHN F. VODOPIA,	)	CASE NO. 1:07CV06214
	)	
Plaintiff,	)	JUDGE BARBARA S. JONES
	)	
vs.	)	MAGISTRATE JUDGE DEBRA C. FREEMAN
	)	
KONINKLIJKE PHILIPS ELECTRONICS	)	
N.V., <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**STIPULATION PARTIALLY RESOLVING PHILIPS' MOTION TO REMOVE  
PLAINTIFF'S COMPLAINT FROM PUBLIC VIEWING OR ACCESS, TO  
PROHIBIT FURTHER DISSEMINATION OF COMPLAINT BY PLAINTIFF,  
AND TO SEAL COMPLAINT AND TO SEAL THE RECORD PENDING  
FURTHER ACTION BY THE COURT**

Now come Plaintiff, John F. Vodopia, Esq. ("Plaintiff") and Defendant Philips Electronics North America Corporation ("Philips"), by and through counsel, and propose the following Stipulation Partially Resolving Philips' Motion to Remove Plaintiff's Complaint from Public Viewing or Access, to Prohibit Further Dissemination of Complaint by Plaintiff, and to Seal Complaint and to Seal the Record Pending Further Action by the Court (Document No. 18) filed on September 19, 2007:

1. Plaintiff's Complaint and all subsequent filings in this case shall be removed from public viewing and/or access on the Court's CM/ECF system. The Clerk is hereby instructed to implement this Order.
2. In the absence of further Order by this Court, this case shall be sealed and the public shall not have access to any subsequent case filings. The Clerk is hereby instructed to implement this Order.

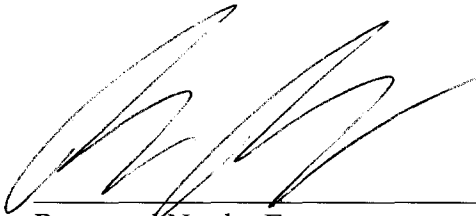
3. This Stipulation is without prejudice to Defendants' right to seek other and/or additional relief to prevent further dissemination of proprietary and confidential information and/or attorney-client privileged information by Plaintiff.

The Court finds that the proposed Stipulation, as stated above, is well taken and therefore enters the above stipulated terms as orders of this Court.

IT IS SO ORDERED.

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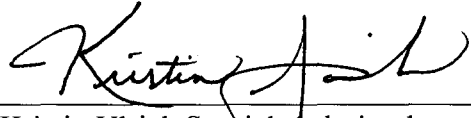
DISTRICT JUDGE BARBARA S. JONES



Raymond Nardo, Esq.  
Law Office of Raymond Nardo  
129 Third Street  
Mineola, NY 11501  
516-248-2121  
Email: [raynardo@juno.com](mailto:raynardo@juno.com)

Attorney for John F. Vodopia, Esq.

Respectfully submitted,



Kristin Ulrich Somich (admitted *pro hac vice*)  
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.  
127 Public Square  
4130 Key Tower  
Cleveland, Ohio 44114  
Telephone: (216) 241-6100

Jennifer Rygiel-Boyd (JR 5676)  
Ogletree, Deakins, Nash, Smoak & Stewart, P.C.  
521 5<sup>th</sup> Avenue, Suite 1700  
New York, New York  
Telephone: (212) 292-4314  
Attorneys for Defendant  
Philips Electronics North America Corporation